

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas
FILED

AUG 15 2019

David J. Bradley, Clerk of Court

United States of America
v.
Thaddeaus Williams; Tydreic Subject;
Andre Palmer

Case No.

H19-1526M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 14, 2019 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 2113(a) and 2.
18 USC 924(c)(1)(A)(ii) and 2

Aiding and Abetting Bank Robbery
Aiding and Abetting Use, Carry or Brandishing of a Firearm in Relation to a
Crime of Violence

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



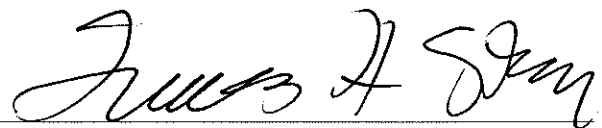
Complainant's signature

Jessica Bruza, TFO

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/15/2019



Judge's signature

City and state: Houston, TX

Honorable Frances H. Stacy

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jessica Bruzas, being duly sworn, do hereby depose and state:

1. I am a Detective with the Houston Police Department [HPD], duly appointed according to law and acting as such. I have been a Peace Officer with the HPD for approximately ten [10] years and am assigned to the Houston Police Department's Robbery Division as a member of the FBI Houston Division Violent Crime Task Force [VCTF]. The VCTF is comprised of Task Force Officers [TFO's] from the Houston Police Department, the Harris County Sheriff's Office, and Special Agents of the FBI. The VCTF is responsible for the investigation of, among other violent crimes, bank robbery. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

2. On Wednesday, August 14, 2019, your Affiant responded to a bank robbery that had occurred at 5:38 PM at 6006 North Fwy, in Houston, Harris County, Texas, which is a Woodforest National Bank (BANK) located within a Gallery Furniture store. Upon arriving, your Affiant was notified by responding primary Houston Police Officer Shumate that officers had been notified by dispatch that a robbery had just occurred at the aforementioned location and

were given the subjects' descriptions and vehicle description, including a partial license plate. Officers were advised the subjects had taken a 3si GPS tracking device during the robbery and were advised of the current location of the 3si tracker. Officers Herrera and Ramos located the SUBJECT VEHICLE in the 3600 block Tidwell Rd. Officers observed the SUBJECT VEHICLE to be a gray Acura sedan, bearing Texas license plate BCM0542, in the 3600 block of West Tidwell Rd. Officers Herrera and Ramos attempted to initiate a traffic stop using all emergency equipment. The SUBJECT VEHICLE refused to stop and continued on for several miles until eventually crashing into a ditch in the 8300 block of Sultan Dr. Officers Herrera and Ramos, along with other responding HPD Officers, observed three unknown black male subjects jump out of the vehicle and run on foot. After a brief foot chase, all three subjects were taken into custody. The three subjects were identified as Thaddeaus Williams (WILLIAMS), Tydreic Sublect (SUBLET), and Andre Palmer (PALMER). WILLIAMS was taken into custody with a back pack which was found to contain four [4] guns and \$8,950.00 in mixed denominations, including the two 3si tracking devices. Officers brought the subjects, the SUBJECT VEHICLE, and the recovered backpack back to the original scene.

3. Affiant and other members of the VCTF, Sergeant David Helms and Deputy Chris Hudson, spoke with the Complainants at the BANK. Affiant learned Re'Neekyia Davis (DAVIS) and Brianna Lewis (LEWIS) were working at the BANK at the time of the incident as tellers. Theortis Familuyi (FAMILUYI) was working as an armed security guard at the location. The Complainants stated all three subjects entered the bank wearing masks and gloves and armed with pistols. One subject, later identified as SUBLET, immediately ran toward FAMILUYI and disarmed him at gunpoint. SUBLET continued to brandish his weapon at other customers in the lobby while ordering them all to the ground and away from the teller counter. Another subject,

identified as WILLIAMS, then jumped over the teller counter and ordered both DAVIS and LEWIS to unlock their teller drawers. In fear for their lives, both complied. DAVIS stated as WILLIAMS jumped over the teller counter, his mask fell down and she was able to briefly see his face. WILLIAMS then collected all of the cash from the teller drawers, including the 3si GPS tracking devices. Meanwhile, the third subject, PALMER, had approached a customer using the ATM near the entrance and had ordered him to the ground at gunpoint and taken \$300 in cash recently dispensed from the ATM. PALMER then remained near the entrance/exit doors until WILLIAMS jumped back over the teller counter and all three subjects exited the BANK. FAMILUYI was able to observe the subjects enter the SUBJECT VEHICLE and noted the license plate began with a "B." The Complainants contacted 9-1-1.

4. Affiant then conducted a show-up with DAVIS and FAMILUYI, who both stated they would be able to recognize at least two of the subjects. At approximately 7:30 PM, PALMER was taken out of an HPD patrol vehicle and DAVIS and FAMILUYI were able to view him from a window of the BANK. Neither DAVIS nor FAMILUYI were able identify PALMER. WILLIAMS was then taken out of his patrol vehicle and DAVIS and FAMILUYI were both able to identify WILLIAMS as the subject who had jumped over the teller counter. SUBLET was then taken from his patrol vehicle. Both DAVIS and FAMILUYI positively identified SUBLET as the subject who had taken FAMILUYI's gun and who had corralled customers within the lobby.

5. FAMILUYI provided Sergeant Helms, with the make, model, and serial number of his gun. Sergeant Helms noted this pistol was recovered out of the backpack which WILLIAMS was in control of at the time of his arrest. Three other pistols were recovered from the backpack as well, which resembled the firearms used in this incident. The clothing worn by the subjects and

observed via surveillance camera was recovered from within the SUBJECT VEHICLE. \$300 in twenty dollar bills was also recovered from PALMER's pocket, which is consistent with \$300 being taken from the ATM customer. The BANK provided your Affiant with a loss amount of \$9,202, which was taken in the course of the robbery. The BANK's recovered money was returned to the BANK and FAMILUYI's recovered pistol was returned to him, as well.

6. All three subjects were then transported to the FBI Houston Headquarters for interviews. WILLIAMS waived his rights and confessed to his involvement in this robbery. WILLIAMS stated that prior to the robbery, he went in to the Gallery Furniture store to use the restroom. WILLIAMS said he then later assisted SUBLET and PALMER in robbing the BANK by jumping over the teller counter and taking money from the teller drawers. WILLIAMS stated he was aware SUBLET and PALMER had pistols, which he knew were real and loaded. WILLIAMS stated that after leaving the BANK, they fled from police. WILLIAMS stated as he ran from police, he tried to take a backpack that contained the stolen money and all of the guns. PALMER also waived his rights and confessed to his role in this robbery. PALMER stated he entered the BANK with a gun and stayed near the doors and the ATM. PALMER stated he took \$300 in cash from the ATM after a customer had just used it. PALMER stated SUBLET was driver and owner of the SUBJECT VEHICLE.

7. Based on the foregoing your affiant believes there is probable cause to believe that on August 14, 2019, Thaddeaus WILLIAMS, Tydreic SUBLET, and Andre PALMER aided and abetted each other and used force, violence, and intimidation to take money belonging to Woodforest National Bank, 6006 North Freeway, Houston, Texas, located in the Southern District of Texas, the deposits of which are insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a) and 2.

8. Further based on the foregoing your affiant believes there is probable cause to believe that on August 14, 2019, Thaddeaus WILLIAMS, Tydreic SUBLET, and Andre PALMER aided and abetted each other and knowingly brandished a firearm during and in relation to a crime of violence, that being a bank robbery that occurred at the Woodforest National Bank, 6006 North Freeway, Houston, Texas, located in the Southern District of Texas in violation of Title 18, United States Code, Section 924(c) and 2.



Detective Jessica Bruzas, Houston Police Department

Sworn to and subscribed before me

This 15 day of August 2019, *and I find probable cause.*


FRANCES H. STACY
UNITED STATES MAGISTRATE JUDGE